

1 Leonard M. Shulman - Bar No. 126349
Rika M. Kido - Bar No. 273780
2 **SHULMAN BASTIAN FRIEDMAN & BUI LLP**
100 Spectrum Center Drive, Suite 600
3 Irvine, California 92618
Telephone: (949) 340-3400
4 Facsimile: (949) 340-3000
Email: LShulman@shulmanbastian.com
5 RKido@shulmanbastian.com

6 Attorneys for A. Cisneros,
Chapter 7 Trustee
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, RIVERSIDE DIVISION**
10

11 In re

12 **TTBGM, Inc.,**

13 Debtor.
14
15
16
17
18
19
20
21
22
23
24
25
26

Case No. 6:20-bk-13005-WJ

Chapter 7

**CHAPTER 7 TRUSTEE'S STATUS
REPORT**

CBGM, LLC Hearing

Date: December 22, 2022

Time: 10:00 a.m.

Place: Courtroom 304

United States Bankruptcy Court
3420 Twelfth Street
Riverside, California 92501

27 **TO THE HONORABLE WAYNE JOHNSON, UNITED STATES BANKRUPTCY**
28 **JUDGE AND ALL INTERESTED PARTIES:**

1 A. Cisneros, the duly appointed, qualified and acting Chapter 7 trustee (“Trustee”) for the
2 bankruptcy estate (“Estate”) of TTBGM, Inc. (“Debtor”), hereby submits this Status Report as
3 requested by the Court in the Preliminary Injunction filed on November 19, 2022 in the adversary
4 proceeding, *Trilogy at La Quinta Maintenance Association v. Stratospheric Holdings 4, LLC*, Adv.
5 Case No. 6:22-ap-01094-WJ (“CBGM Adversary Proceeding”).¹ There is a further hearing
6 regarding the Preliminary Injunction scheduled for December 22, 2022 at 10:00 a.m.

7
STATUS REPORT

8 Since the prior Status Conference in this case and the hearing on the preliminary injunction
9 in the CBGM Adversary Proceeding held on November 29, 2022, Thomas Brown vacated the real
10 property located at 60151 Trilogy Parkway, La Quinta, CA (“Trilogy Property”), removed any
11 perishable items, and turned the Trilogy Property over to the Trustee. The Trustee made
12 arrangements for the locks to be changed at the Trilogy Property and the Trustee’s broker (“Broker”)
13 advised on December 13, 2022 that the locks have been changed. The Broker also made
14 arrangements for representatives from the Trilogy at La Quinta Maintenance Association
15 (“TLQMA”) and Trustee Simons to access and view the Trilogy Property on December 6, 2022.

16 In mid-November, the Trustee reduced the listing price for the Trilogy Property from
17 \$5,995,000 to \$4.5 million. Since the price reduction, the Broker advised that the listing for the
18 Trilogy Property has been viewed 3,091 times and has had 280 detailed page clicks² via
19 LoopNet/CoStar. The Estate is advised that the Broker has also responded to numerous listing
20 inquiries via text, calls, and emails. Further, the Broker sent out approximately 1,500 direct
21 marketing emails to potential buyers, including his contacts in the area and national prospects, about
22 the reduced price. Lastly, two interested groups, including TLQMA, have viewed the Trilogy
23 Property.

24 ///

25
26 ¹ The CBGM Adversary Proceeding is associated with the bankruptcy case, *In re CBGM, LLC*, Bankruptcy Case No.
27 6:22-bk-14008-WJ (“CBGM Bankruptcy Case”).

28 ² A “detailed page click” is when a prospective buyer actively clicks on the listing to get more detailed information on
the property, including all of the details regarding the listing.

1 Finally, the secured lender for the Trilogy Property, Byline Bank, has indicated its
2 willingness to continue to work with the Trustee, and not Mr. Brown, on a sale of the Trilogy
3 Property. To that end, the Trustee and his counsel remain in communication with Byline Bank about
4 the status of this case and ensuring the sale of the Trilogy Property will benefit unsecured creditors.

5 Respectfully submitted,

6 **SHULMAN BASTIAN FRIEDMAN & BUI LLP**

7
8 DATED: December 19, 2022

By: /s/ Rika M. Kido

9 Leonard M. Shulman

10 Rika M. Kido

11 Attorneys for A. Cisneros, Chapter 7 Trustee
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 100 Spectrum Center Drive, Suite 600, Irvine, CA 92618.

A true and correct copy of the foregoing document entitled (*specify*): **CHAPTER 7 TRUSTEE'S STATUS REPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **December 19, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **December 19, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

CBGM, LLC Interim Chapter 7 Trustee Larry D. Simons Email: larry@lsimonslaw.com	Proposed Counsel for CBGM, LLC Interim Chapter 7 Trustee Richard A. Marshack, Esq. Email: RMarshack@MarshackHays.com
--	---

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 19, 2022

Date

Anne Marie Vernon

Printed Name

/s/ Anne Marie Vernon

Signature

NEF SERVICE

INTERESTED PARTY: Wendy L Benjamin wendy@benjaminlawoffices.com
CHAPTER 7 TRUSTEE: Arturo Cisneros arturo@mclaw.org, CACD_ECF@mclaw.org
CHAPTER 7 TRUSTEE: Arturo Cisneros (TR) amctrustee@mclaw.org,
acisneros@iq7technology.com;ecf.alert+Cisneros@titlexi.com
COUNSEL FOR THE DEBTOR: Thomas C Corcovelos corforlaw@corforlaw.com
INTERESTED PARTY: Edwin R Cottone ed@cottonemoon.com
INTERESTED PARTY: Abram Feuerstein abram.s.feuerstein@usdoj.gov
INTERESTED PARTY: Chris L Frost Chris@weinberg-gonser.com, megan@weinberg-
gonser.com;zach@weinberg-gonser.com
INTERESTED PARTY: Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
INTERESTED PARTY: David M Goodrich dgoodrich@wgllp.com,
kadele@wgllp.com;lbracken@wgllp.com;wgllp@ecf.courtdrive.com;gestrada@wgllp.com
INTERESTED PARTY: Everett L Green everett.l.green@usdoj.gov
INTERESTED PARTY: Lemuel Bryant Jaquez bknotifications@ghidottiberger.com,gbadmin@ecf.courtdrive.com
INTERESTED PARTY: Raffi Khatchadourian raffi@hemar-rousso.com
COUNSEL FOR THE CHAPTER 7 TRUSTEE: Rika Kido rkido@shulmanbastian.com,
avernon@shulmanbastian.com
INTERESTED PARTY: Erica T Loftis Pacheco bknotifications@ghidottiberger.com
INTERESTED PARTY: Charity J Manee cmanee@goeforlaw.com, kmurphy@goeforlaw.com
INTERESTED PARTY: Ronak N Patel rpatel@rivco.org, dresparza@rivco.org;mdominguez@rivco.org
INTERESTED PARTY: Eric S Pezold epezold@swlaw.com, knestuk@swlaw.com
INTERESTED PARTY: Samuel Price sprice@pooleshaffery.com, mvalenti@pooleshaffery.com
INTERESTED PARTY: Cameron C Ridley Cameron.Ridley@usdoj.gov
COUNSEL FOR THE CHAPTER 7 TRUSTEE: Leonard M Shulman lshulman@shulmanbastian.com
INTERESTED PARTY: Andrew Still astill@swlaw.com, kcollins@swlaw.com
INTERESTED PARTY: Alan G Tippie atippie@sulmeyerlaw.com,
atippie@ecf.courtdrive.com;pdillamar@sulmeyerlaw.com,kfiles@sulmeyerlaw.com;mviramontes@sulmeyerlaw.com
INTERESTED PARTY: United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov
INTERESTED PARTY: Brian D Walters bwalters@pooleshaffery.com, acontreras@pooleshaffery.com